



## Minnesota Pollution Control Agency

ml 130

March 8, 1983

Mr. Richard B. Clute  
Franklin Manufacturing Company  
701 33rd Avenue North  
St. Cloud, Minnesota 56301

MND 092 304 856

Dear Mr. Clute:

The Minnesota Pollution Control Agency (MPCA) is in receipt of your February 7, 1983 letter and enclosures. I will address the adequacy of Franklin Manufacturing Company (FMC) "Storage and Handling Procedures for Hazardous Waste" and the "Employee Hazardous Waste Management Training Record."

After review of FMC's "Storage and Handling Procedures for Hazardous Waste" by MPCA staff, it has been determined that the procedure satisfy the U.S. Environmental Protection Agency (EPA) requirements as specified in 40 CFR Part 265 Subpart C and D. The storage and handling procedures will be filed in your hazardous waste management plan, thus meeting the requirements of 40 CFR Part 265.53(b).

Overall FMC's "Employee Hazardous Waste Management Training Record" looked good. However, the record lacked the employee's job title. Therefore, the MPCA staff request that FMC amend the training record to incorporate the employee's job title.

As per FMC request, I will address the handling and disposal of "Floor Dri" absorbent generated in FMC's daily operations. It is the MPCA staff's position that absorbent used in the cleanup of small (less than one gallon) oil (hydraulic cutting, etc.) spills can be disposed of through normal solid waste handling practices. However, any cleanup material resulting from a spill that involves commercial chemical products or their intermediates specifically listed in 40 CFR 261.33(e) and (f) or which involves material that may be hazardous pursuant to 6 MCAR 54.9002 must be managed as a hazardous waste.

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WASTE MANAGEMENT  
BRANCH

Phone: \_\_\_\_\_

1935 West County Road B2, Roseville, Minnesota 55113-2785

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Mr. Richard B. Clute  
Page Two

It is the present understanding of the MPCA that FMC is in the process of closing their hazardous waste storage facility and requesting the EPA to withdraw their Part A permit application from further permitting consideration. Please be advised that during my initial EPA hazardous waste inspection, FMC qualified as a federal hazardous waste storage facility. In order to close your storage facility, FMC must fulfill the EPA closure requirements contained in 40 CFR Part 265.111 through 115. Please find enclosed a copy of these requirements for your information. This would include submitting FMC's closure plan to the EPA, Region V administrator and this office. Prior to closure FMC must dispose of or recycle all hazardous waste that have been accumulated for more than 90 days. The MPCA will review your closure plan and make arrangements with you to conduct a final inspection verifying closure.

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given +  
B. Strom  
of Version  
for Part A  
file.  
KPS  
3/25/83

A copy of this letter will be sent to the EPA, Region V office in Chicago, Illinois. Any enforcement actions related to this inspection will be initiated by the EPA or the MPCA. This letter does not preclude the MPCA from taking other enforcement actions as warranted pursuant to any violations of Minnesota regulations and statutes.

If you have any questions, please contact me at 612/297-2710 or Kenneth Skahn at 312/886-4158 of the EPA, Region V.

Sincerely,

*Michael J. Tibbetts*

Michael J. Tibbetts  
Compliance and Enforcement Unit  
Regulatory Compliance Section  
Solid and Hazardous Waste Division

MJT/dc

cc: Mr. Richard Dell, EPA, Region V  
Mr. Larry Shaw, MPCA Regional Office, Brainerd